



February 12, 2014

California Coastal Commission  
c/o Sea-Level Rise Working Group  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

via email: [SLRGuidanceDocument@coastal.ca.gov](mailto:SLRGuidanceDocument@coastal.ca.gov)

**Re: Comments on the California Coastal Commission's Draft Sea Level Rise Policy Guidance**

Dear Sea-Level Rise Working Group:

The City & County of San Francisco (CCSF) appreciates the opportunity to review and comment on the California Coastal Commission's Draft Sea Level Rise Policy Guidance document, announced for review on October 14, 2013. As a City we are both a permitting authority and land manager for our coastal resources. In this dual-role, we share the Commissions' commitment to stewardship of these public resources. Climate change poses significant challenges to vital infrastructure, public health and safety, and resource management. Planning for climate change also challenges us to come up with new ways of making decisions – while we can no longer rely upon past practice, the nature of the future is also difficult to discern with precision.

The Coastal Commission's Draft Sea Level Rise Policy Guidance ("Draft SLR Guidance") is a landmark document as it is among the first detailed technical guidance documents seeking to assist local government in planning for the effects of sea level rise. The Draft SLR Guidance is a well-written, detailed explanation with step-by-step guidance on adaptation planning. It will be of great assistance to local governments in preparing for and responding to the effects of sea-level rise. In light of our awareness of the document's import, we have two specific comments we'd like to offer.

**Comment No 1: Best Available Science and Sea Level Rise Projections.** The Draft SLR Guidance urges local governments and permit applicants to consider local hazard conditions, project lifespan or planning horizon, sensitivity to sea-level rise related hazards, adaptive capacity, and risk tolerance in developing sea-level rise adaptation strategies for any particular plan or project. Appendix B provides two methodologies for developing local hazard conditions appropriate for specific projects and planning efforts. While this type of local-specific and case-by-case approach will add considerable complexity to our planning and project development and review processes, the CCSF agrees that the methodologies provided in the Draft Guidance are superior to adopting a "one size fits all" approach to this issue. In fact, the CCSF feels strongly that this type of site and project-specific analysis is required to ensure responsible land use and

infrastructure planning and regulation. However, we are concerned that by presenting only the extremes of the NRC 2012 sea-level rise ranges (1.6-11.8 inches by 2030, 4.7-24 inches by 2050, and 16.6-65.8 inches by 2100) in several places throughout the Draft SLR Guidance<sup>1</sup>, these numbers may be misconstrued by the public, media, and/or decision makers as de facto standards, contrary to the intent of the Draft SLR Guidance. These figures are considered by climate scientists and in the NRC Report to represent *less likely though possible* rates of sea level rise, which means they should be considered by local governments, but not to the exclusion of more likely scenarios. The more likely scenarios are in fact included in numerous places in the NRC Report, are labeled “projections,” (e.g.  $5.7 \pm 2.0$  inches by 2030,  $11.0 \pm 3.6$  inches by 2050, and  $36.2 \pm 10.0$  inches by 2100). The projections are an important part of the report’s science conclusions. We therefore suggest revising the Draft SLR Guidance to eliminate references to the extremes of the ranges only and, where sea-level rise numbers are presented, to include both the NRC Report projections and the ranges. We feel that these revisions would further support local governments’ ability to successfully implement the more nuanced and complex analytical methods recommended in the Draft Guidelines.

Note: The CCSF notes and incorporates by reference additional comments on related matters being submitted by the San Francisco Public Utilities Commission.

**Comment No 2: Updating San Francisco’s Local Coastal Program to accommodate sea level rise without jeopardizing interim projects with critical coastal permitting needs.** The Draft SLR Guidance further establishes the desire of the Coastal Commission to secure updates to Local Coastal Programs (LCPs). The CCSF shares the Commission’s desire to update our planning documents to help us best prepare for climate change. To achieve this goal, the City will work to address sea level rise in our LCP. That said, even a minor update to our planning documents, demands engaging in needed public dialog that is time-consuming and unpredictable. It should be noted that CCSF has many projects underway that are in the public interest and may need Coastal Development Permits prior to the completion of an LCP update, including implementation of recommendations for the management and protection (i.e., wastewater facilities south of Sloat Boulevard) of San Francisco’s Ocean Beach which are outlined in the 2012 Ocean Beach Master Plan. Other wastewater projects include various upgrades and/or improvements to the Oceanside Plant and the Westside Pump Station. See Attachment A for a brief outline of these anticipated projects. The San Francisco Zoo is working on an Ocean and Coastal Center in conjunction with NOAA and SFPUC. Largely because of these concerns, CCSF has not yet initiated an update to our LCP.

In this regard, we are seeking the following from the Coastal Commission:

**2a:** Assurance that if the CCSF engages in good-faith effort to update our LCP, necessary Coastal Development Permits sought by CCSF while the LCP update is underway will be processed in a timely way under the current regulatory structure and will not be delayed while the updated LCP is being considered and/or in process.

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<sup>1</sup> Use of the extreme ranges alone, without the more likely projections, are included in the first paragraph of the Executive Summary, Table 1 and elsewhere throughout the draft document.

**2b:** Assistance with the identification of funding resources for CCSF's future update to the LCP.

Again, the City & County of San Francisco appreciates the opportunity to work with the California Coastal Commission on the issue of climate change and sea level rise. We provide our comments and concerns with a deep commitment to work with the Coastal Commission on the best possible solutions to these issues for the people of San Francisco.

If you have any questions regarding these comments, please contact AnMarie Rodgers, Manager, Legislative Affairs at the San Francisco Planning Department at (415) 558-6395 and [anmarie.rodgers@sfgov.org](mailto:anmarie.rodgers@sfgov.org).

Sincerely,



Roger Rahn  
Senior Advisor

**Attachment A: SFPUC Wastewater Enterprise Project List**

<b>Oceanside Plant</b>	<b>Start</b>	<b>End</b>
Fine Screen and Grit Removal Enhancements	26-Mar-15	20-Jan-17
Odor Control Optimization	01-Jul-16	30-Jun-17
Condition Assessment Repairs	01-Jul-16	30-Jun-17
Oxygen/Aeration System Replacement	none	none
Digester Gas Handling Utilization Enhancements	01-Oct-14	01-Apr-16
<b>Westside Pump Station</b>		
Westside Pump Station Redundant Force Main Improvements	04-Jan-16	30-Jun-17
Westside Pump Station Reliability Improvements	02-Jul-15	30-Jun-17